



## Risk Evaluation Determining Whether Environmental Emergency Planning is Required Under the ***Environmental Emergency Regulations*** set under the ***Canadian Environmental Protection Act, 1999*** **(CEPA 1999)**

This report is a consolidation of two substances listed under Schedule 1 of the *Environmental Emergency Regulations* set under CEPA 1999. The substances inherent hazardous properties are virtually the same.

**Chromic Acid (CAS #: 7738-94-5)  
AND Chromium Trioxide (CAS #: 1333-82-0)**  
*(Hexavalent Chromium Compounds)*  
**(CEPA, 1999 – Schedule 1, #33)**

### Summary of Risk Evaluation Analysis

The Risk Evaluation Framework (REF), developed by Environment Canada, is applied to chemical substances in order to determine whether or not an environmental emergency (E2) plan should be required. For those substances that are evaluated as requiring an E2 plan, the next step is to determine a threshold quantity for the total quantity of the substance and the maximum storage container size on site. Within the REF, three categories are used to evaluate chemicals and assign threshold quantities. Shown below are the details within the three categories for *chromium trioxide* and *chromic acid*:

#### 1. Environment Hazard

##### **(Persistence, Bioaccumulation and Aquatic Toxicity Analysis)**

- According to Mackay *et al*, (2003) nickel, chromium, arsenic, and cadmium are classified as indefinitely persistent. As a result, *chromium trioxide* and *chromic acid* are also classified as indefinitely persistent.
- "Food chain concentration potential: none" (HSDB, 2002).

- For aquatic toxicity, it was determined that *chromium trioxide* and *chromic acid* are moderately toxic (LC<sub>50</sub> at 96 hrs between 1 and 10 mg/L) based on the most sensitive species, Atlantic salmon (Grande *et al*, 1983).

## 2. Human Hazard

### (Inhalation Toxicity and Carcinogenicity Analysis)

- Since *chromium trioxide* and *chromic acid* have a vapour pressure below 1.33 kPa at 20°C (ChemInfo, 1995; Genium, 2004), there is insufficient vapour from the substance to cause an inhalation problem.
- Chromium trioxide* and *chromic acid* are categorized as an United States Environmental Protection Agency (US EPA) carcinogen with a classification rating of 'B2' (Genium, 2004) and as an International Agency for Research on Cancer (IARC) carcinogen with a classification rating of '1' (IARC, 1990).

## 3. Physical Hazard

### (Flammability and Combustibility Analysis)

- Chromium trioxide* and *chromic acid* are stable under normal storage conditions, and hazardous polymerization will not occur (Genium, 2004). National Fire Protection Association (NFPA) has rated this chemical as "1" for reactivity (NFPA, 2002).

### Flammability and Combustibility Analysis Table

	Value	Vapour Cloud Explosion (Yes/No)	Combustible (Yes/No)	References
Boiling point (°C)	250 (decomposes)	No	No	(NFPA, 2002)
Flash point (°C)	Non-flammable			(Genium, 2004)

## Threshold

The data from the above mentioned categories were used to determine the various environmental/human thresholds. The threshold quantities relate to: carcinogenicity, aquatic toxicity, inhalation toxicity, vapour cloud explosion, combustibility, and reactivity.

The threshold quantity for carcinogenicity is defaulted to 0.22 tonnes, if it meets the following criteria:

- 1) have an IARC rating of 1, 2A or 2B, or have a US EPA rating of A, B1, or B2;
- 2) be persistent in any media for greater than 5 years.

Threshold quantities assigned as a result of aquatic toxicity are based on the following table:

**Threshold Quantities Assigned as a Result of Aquatic Toxicity**

Criteria	Extremely Toxic	Highly Toxic	Moderately Toxic	Slightly Toxic
<b>Persistence (water)</b>	≥ 6 months	≥ 2 months to < 6 months	N/A	N/A
<b>Bioaccumulation</b>	BCF ≥ 5000 or Log Kow ≥ 5	BCF ≥ 500 to < 5000 or Log Kow ≥ 4 to < 5 (unless BCF < 500)	N/A	N/A
<b>Acute Aquatic Toxicity (96 hrs LC<sub>50</sub> – mg/L)</b>	≤ 0.1	> 0.1 to ≤ 1	> 1 to ≤ 10	> 10 to ≤ 100
<b>Threshold Quantity Tonnes (lbs)</b>	<b>0.22 (500 lbs)</b>	<b>1.13 (2 500 lbs)</b>	<b>4.50 (10 000 lbs)</b>	<b>9.10 (20 000 lbs)</b>

A substance is a candidate for a vapour cloud explosion if its flash point is < 23°C and its boiling point is < 35°C. A substance is considered combustible if its flash point is < 23°C or its boiling point is < 35°C. In accordance with the precautionary principle, the category with the lowest threshold will be used. For further explanation, please refer to the *Implementation Guidelines for Part 8 of the Canadian Environmental Protection Act, 1999 – Environmental Emergency Plans* (<http://www.ec.gc.ca/ee-ue/>).

## Conclusion

For *chromium trioxide* and *chromic acid* #33, the E2 hazard threshold was triggered by:

- 1) Aquatic toxicity at 0.22 tonnes;
- 2) Carcinogenicity at 0.22 tonnes.

Therefore, *chromium trioxide* and *chromic acid* # 33 are recommended for addition to Schedule 1 of the *Environmental Emergency Regulations* under Part 3 with a threshold quantity of 0.22 tonnes.

## References

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